

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SHIVA AYYADURAI, an individual,	:	
	:	Case 1:16-cv-10853
Plaintiff,	:	
	:	
v.	:	
	:	
GAWKER MEDIA, LLC, a Delaware	:	
limited liability company; SAM BIDDLE, an	:	
individual, JOHN COOK, an individual,	:	
NICHOLAS GUIDO ANTHONY DENTON,	:	
an individual, and DOES 1-20,	:	
	:	
Defendants.	:	

**DEFENDANTS GAWKER MEDIA, LLC, SAM BIDDLE AND JOHN COOK’S
MOTION TO DISMISS**

Defendants Gawker Media, LLC, Sam Biddle and John Cook (the “Movants”) hereby move this Court pursuant to Federal Rule of Civil Procedure 12(b)(6) to dismiss the Complaint as to them in its entirety for failure to state a claim upon which relief may be granted. In support of their motion, the Movants rely on and incorporate the accompanying Declaration of Rachel F. Strom, Esq. and Memorandum of Law.

RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1(a)(2), the parties have conferred and attempted in good faith to resolve this issue and Plaintiff does not consent to the requested relief.

Dated: October 10, 2016

Respectfully submitted,
LEVINE SULLIVAN KOCH & SCHULZ, LLP

By: s/ Rachel F. Strom

Rachel F. Strom, BBO # 666319
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*Counsel for Defendants Gawker Media, LLC,
Sam Biddle and John Cook.*

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of October, 2016, I electronically transmitted the foregoing **MOTION TO DISMISS THE COMPLAINT** to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants, as Plaintiff's counsel, and all counsel of record:

Timothy Cornell
One International Place, Suite 1400
Boston, MA 02110
Tel: (617) 535-7763
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I further certify that on October 10, 2016, I served a true copy of same by US Mail upon:

Charles J. Harder, Esq.
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Beverly Hills, California 90212
Tel. (424) 203-1600
Email: CHarder@HMAfirm.com

s/ Rachel F. Strom
Rachel F. Strom